



October 20, 2011

**VIA ECFS**

Julius Genachowski, Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Eighth Floor  
Washington, D.C. 20554

**Re: High-Cost Universal Service Support; WC Docket Nos. 10-90, 05-337, 06-122, 07-135; GN Docket No. 09-51; CC Docket No.s 96-45, 01-92, 96-98**

Dear Chairman Genachowski:

MTPCS, LLC d/b/a Cellular One ("MTPCS") respectfully urges the Commission to ensure that consumers do not lose wireless service in areas where existing CETCs provide coverage. Rural citizens who now rely upon these networks should not be subjected to disruption, including business disruptions, from loss of service during the transition to a new support mechanism.

If support is removed from a patchwork of areas where some unsupported carrier claims to provide coverage, local carriers will need to turn down service over the entire area of small islands they serve, whether in isolation or a far-flung archipelago, where unsupported carriers do not claim or provide coverage. Decommissioning of sites would be necessary because stranded islands of wireless service are neither feasible nor fiscally responsible to operate. And yet, the remaining customers may be left with no service, because the unsupported carrier may not in fact serve those areas, or provides only very weak or intermittent signal, or supports only a technology protocol not compatible with the phones of the local carrier's customers.

As you know, a CDMA phone does not work on a GSM network, and vice-versa, and the same problem exists because of a lack of interoperability requirement with respect to LTE protocols. In order to thoughtfully avoid these extremely adverse results, the Commission must ensure the transition to a new mechanism does not, contrary to all goals of universal service, result in *loss* of existing service in rural areas.

In extremely challenging areas, wireless service is both more necessary and, ironically, less present, due to the high costs of construction and operation in these vast lands. *See Inquiry Concerning the Deployment of Advanced Telecommunications Capability*, GN Docket Nos. 09-137, 09-51, Report, 25 FCC Rcd 9556, Appendix B (2010) (*Sixth Broadband Deployment Report*). In contrast to the national average population density of

Cellular One • 1170 Devon Park Drive, Suite 104 • Wayne, PA 19087  
610.535.6900 • 610.688.5209 • Fax [www.cellonenation.com](http://www.cellonenation.com)

283.47, the average population densities in Montana, Oklahoma and Louisiana are 2.7, 31, and 34 persons per square mile, respectively. Moreover, all three of these states have average incomes less than the national average, poverty exceeding the national average, and large tribal land areas. As a result of such challenges, the Montana Public Service Commission “believes that loss of CETC funding for the wireless CETCs in Montana would dramatically reduce wireless coverage in extremely rural areas of Montana.” This is accurate. A gap in funding would create inability to sustain networks and therefore permanent decommissioning of sites.

In order to avoid that adverse result, we urge the Commission to continue funding for high cost areas that otherwise would suffer loss of service during the transition. We propose that the Commission address this need by adopting the following language:

“In this proceeding... we are mindful that the most important goal of the Connect America Fund is to ensure that those areas most in need of universal service support for broadband deployment get such funding. Moreover, as we stated in the Notice in these proceedings, ‘Given the strong consumer demand for mobile services, ubiquitous mobile coverage must be a national priority.’ *Notice*, at ¶ 241. Accordingly, we require that any interim or future cost model or other transition mechanism distribute to with population densities and income averages lower than the national average, that currently lack access to broadband commercial mobile radio services, no less federal universal service support, including support for competitive eligible telecommunications carrier services, than such areas received from the high cost mechanism in 2010. This interim requirement should remain in effect until broadband deployment and subscribership measures in such areas resemble national measures. This approach is in the public interest, consistent with the plain terms of Section 254(b) of the Communications Act, and appropriate to ensure that such areas receive the transformational benefits engendered by ubiquitous broadband deployment.”

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. K. Tanner', is written over a light yellow rectangular background.

Julia K. Tanner  
General Counsel

Cc: Marlene Dortch, Secretary, FCC  
David LaFuria, Esq.